

Crematoria
Abatement of
Mercury
Emissions
Organisation -

INFORMATION UPDATE January 2006



- Sharing the burden –sharing the solutions.

Dear Member

I am sure you will be aware from my letter in November 2005 that in recent months we have continued developing CAMEO and negotiating on your behalf with SEPA, Defra and the Minister Ben Bradshaw MP. We felt this was necessary as AQ1(05) issued in January 2005, did not wholly reflect the proposals we had submitted on behalf of the membership, as part of the review that took place during 2004.

The guidance note, AQ1(05) Control of Mercury Emissions from Crematoria, did of course recognise our key concern that some crematoria could not install abatement plant and provided the fairest mechanism for overcoming this problem, burden sharing. It also recognised that CAMEO was the only national burden sharing scheme available.

It did not, however, provide a legal basis for CAMEO to be developed and operate; this left a degree of uncertainty amongst a number of members that we have sought to clarify.

The key results of our efforts have been:

Legal basis for burden sharing

In July 2005 the Federation and Cremation Society sought a legal opinion concerning the legality of Cremation Authorities burden sharing. The result was that authorities already had the necessary legal powers, details are available on the Federation website, www.fbca.org.uk

Staged Introduction

The Federation's response to the Defra consultation process in 2004 had called for a staged introduction of abatement. In September 2005 Defra issued a note recognising the finite capacity of cremator manufacturers, and therefore the

importance of introducing the new abatement equipment to the industry in a staged manner.

AQ13 (05) Crematoria/Burden sharing

A number of members expressed concern that their Local Authority Regulators did not appear to be aware of the requirements placed upon them by AQ1 (05). As a result of discussions with Defra, AQ13 (05) was issued to make regulators aware of what was expected from them.

AQ 24(05) – Burden Sharing

The latest Air Quality Note, AQ 24(05) is the direct result of representations made by the Federation on behalf of its membership to Defra and the Minister Ben Bradshaw MP. It has deferred the reporting deadline by five months from the 31st December 2005 to the 1st June 2006.

In addition it has provided further information on burden sharing and a number of points intended to clarify for regulators and operators the considerations likely to be material in deciding whether to fit abatement equipment or contribute to the cost through burden sharing. The key points contained in the note can be summarised as follows:

3 (a) The focus for mercury abatement should not be on local environmental protection, because the problem arising from mercury emissions is from long range transportation. It is for this reason that a national abatement target for mercury has been set.

3 (b) The reduction in mercury emissions has been set at 50% to reflect an appropriate balance between costs to the cremator operators, and the bereaved, and benefits to the environment. Defra, the Welsh Assembly Government and Scottish Executive are not seeking levels above 50% abatement. (There is **no** requirement for the UK to achieve 100% abatement in 2020)

3 (c) Sharing the burden of achieving 50% abatement across the industry, if properly managed, will minimise increases in cremation fees. If this approach fails to achieve the required 50% Defra and SEPA will require the larger crematoria to abate in order to achieve the required reduction.

3 (d) (i) A good many operators have concluded that the best way is to join the CAMEO scheme, which is arranging burden sharing at the national level and provides an umbrella organisation for both running the system and reporting to Defra, SEPA and the Welsh Assembly Government.

CAMEO will issue guidance on the criteria for deciding whether cremation authorities are to fit abatement or contribute towards the cost and will approve and register all burden sharing arrangements, with CAMEO members all being free to choose their burden sharing partners.

CAMEO intend levying and administering an environmental surcharge from members from January 2007, which is considered by the scheme to be the most economical and effective way to collect and redistribute to authorities fitting abatement equipment in line with the phasing programme.

3 (d) (ii) some operators have chosen to fit abatement to a proportion of the cremators at their crematorium/crematoria

iii) some operators have made local agreements with nearby operators to share costs and abatement

Both ii) and iii) could be undertaken within the CAMEO scheme, with CAMEO verifying the arrangements and monitoring the data.

4. The indicative phasing timetable was issued to cremation organisations because cremator and abatement equipment manufacturers are unlikely to be able to meet demand if it is concentrated in the last two or three years before the 2012 deadline.

The AQ Notes set out above have clarified a great deal of the uncertainty which previously existed over the burden sharing approach and I would recommend that members read them.

In addition I can confirm that Cremation Authorities who elect to burden share through the CAMEO scheme are not required to identify a partner. CAMEO is your partner and the Regulatory Authority should be made aware of this. Further, Cremation Authorities that fit abatement equipment and wish to be a partner in the CAMEO scheme need to advise their Regulatory Authority that they are a member of the scheme.

Payments into and from the CAMEO scheme will commence for cremations carried out from 1st January 2007. Payments will be paid during each calendar year from 2007 and will only be paid on the % of cremations carried out after its own 50% target (based on 2003 cremation numbers) has been reached. Only members of the CAMEO scheme will receive payment from CAMEO. No payments will be made by CAMEO for cremations abated prior to 1st January 2007

It would seem unlikely that Defra and SEPA will issue any further AQ Notes concerning this subject and it is therefore up to the industry to adopt the scheme set out above.

The CAMEO Management Board will meet for the first time on the 6th January 2006 and minutes will be circulated immediately afterwards with further information.

Brendan Day
CAMEO Manager
27th December 2005